IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE, TENNESSEE

WORD MUSIC, LLC., a Tennessee Limited Liability company, DAYSPRING MUSIC, LLC, a Tennessee Limited Liability Company, WORDSPRING MUSIC, LLC., a Tennessee Limited Liability company, UNICHAPPELL MUSIC, INC., a Delaware corporation, CHAPPELL & CO., INC., a Delaware corporation, COTILLION MUSIC, INC., a Delaware Corporation, RIGHTSONG MUSIC, INC., a Delaware Corporation, WALDEN MUSIC, INC., a New York Corporation, WARNER/TAMERLANE PUBLISHING CORP., a California corporation, and WB MUSIC CORP., a California corporation,

Plaintiff,

vs.-

PRIDDIS MUSIC, INC., a Nevada corporation, RICHARD L. PRIDDIS, individually, PROSOUND KARAOKE LTD., a United Kingdom corporation, MEDIOSTREAM, INC., a California corporation, d/b/a "K SUPERSTAR," D.J. MILLER MUSIC DISTRIBUTORS, INC., a Colorado corporation, d/b/a "PROSING," and DALE S. MILLER, Individually

Defendants.

Case No. 3:07-cv-502

JURY DEMAND

Judge Haynes

MOTION FOR REASSIGNMENT PURSUANT TO ADMINISTRATIVE ORDER NO. 176

NOW COME Plaintiffs WORD MUSIC, LLC, *et al*, by and through their attorneys, Paul Harrison Stacey, Law Offices of Paul Harrison, P.C., and Timothy L. Warnock, Bowen, Riley, Warnock & Jacobson, PLC, and for their **MOTION FOR REASSIGNMENT PURSUANT TO ADMINISTRATIVE ORDER NO. 176**, state as follows:

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1. This case is a copyright infringement action which has been brought against six (6) Defendants, two of whom have previously been the subject of a similar copyright infringement action recently resolved through settlement, which case was assigned to Senior Judge Thomas Wiseman.

2. The case involving the two related defendants which was assigned to Judge Wiseman was captioned "*Famous Music L.L.C, et al., vs. Slep-Tone Entertainment Corp., d/b/a "SOUNDCHOICE" et al.*, Case No. 3:06-cv-696. ("SOUNDCHOICE Litigation")

3. The two Defendants in this case who were parties to the SOUNDCHOICE Litigation are D.J. MILLER MUSIC DISTRIBUTORS, INC., a Colorado corporation, and DALE S. MILLER, individually (MILLER Defendants). Those Defendants are represented by John C. Bradshaw III, who also represented them in the previous case.

4. The Plaintiffs' claims in this case are based upon the MILLER Defendants' unlawful manufacture and/or distribution, advertisement and sale of unlicensed "karaoke" recording of the Plaintiffs' music copyrights. The same types of claims were brought by a different music publisher in the SOUNDCHOICE Litigation which was assigned to Judge Wiseman based on similar, if not identical, actions by the MILLER Defendants involving another manufacturer.

5. The relatedness of the transactions, the common questions of law and/or fact, the fact that two of the Defendants are the same parties suggest that it is in the interest of justice, based upon the totality of the circumstances and the purposes behind Administrative Order No. 176, that the Court exercise its discretion in favor of reassigning this case to Judge Thomas Wiseman.

WHEREFORE, the Plaintiffs, WORD MUSIC LLC, *et al.*, respectfully request entry of an Order *granting* their **MOTION FOR REASSIGNMENT PURSUANT TO ADMINISTRATIVE ORDER NO. 176**, reassigning this case to Senior Judge Thomas Wiseman and providing such other relief as to the Court seems appropriate in the circumstances.

RESPECTFULLY SUBMITTED,

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Attorneys for Plaintiffs Word Music, LLC et al.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically via the Court's ECF system upon:

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this the 5th day of September, 2007.

s/ Timothy L. Warnock